

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream Networks, Inc., *et al.*¹

The Debtors.

Chapter 11

Bky Case No. 23-10763 (DJB)
(Jointly Administered)

**SECOND DECLARATION OF CHARLES M. “BUD” ROBERTSON IN SUPPORT OF
VISUAL SEMICONDUCTOR, INC.’S OPPOSITION TO THE OMNIBUS MOTION OF
WILLIAM A. HOMONY IN HIS CAPACITY AS CHAPTER 11 TRUSTEE FOR ENTRY
OF AN ORDER: (I) APPROVING SETTLEMENT AGREEMENT WITH REMBRANDT
3D HOLDING, LTD. PURSUANT TO FED. R. BANKR. P. 9019(a) AND 11 U.S.C. §
105(a); (II) ENFORCING DEFENSE AND INDEMNITY OBLIGATIONS OF
SEECUBIC, INC.; AND (III) GRANTING RELATED RELIEF**

1. My legal name is Charles M. Robertson, but in my professional capacity I am commonly known as Bud Robertson. I am the Vice President of Operations for Visual Semiconductor, Inc. (“VSI”), a Wyoming corporation. I am authorized to make this declaration on behalf of VSI in connection with the above-captioned bankruptcy case. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently thereto.

2. I submit this second declaration in support of VSI’s opposition to the Chapter 11 Trustee’s Omnibus Motion to Approve a Settlement Agreement with Rembrandt 3D Holding Ltd. (“Rembrandt”) filed on July 15, 2025 (the “9019 Motion”) and to further substantiate facts stated in my first declaration filed on this date.²

¹ The Debtors, together with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

² Docket No. 1058

3. Between November 8, 2024 and April 11, 2025, pursuant to a Litigation Funding and Confirmation Agreement (the “LFCA”) and its two amendments, VSI made wire transfer payments totaling \$270,500 to Rembrandt and to Rembrandt’s counsel, Christopher Michaels, at Brown & Michaels, PC. The payments were as follows:

Payment <u>Date</u>	Rembrandt Counsel <u>Brown & Michaels</u>	Rembrandt CEO <u>SVS 3D</u>
11/08/24	\$3,000.00	\$25,000.00
11/15/24	\$3,000.00	\$20,000.00
11/21/24	\$12,000.00	\$6,500.00
11/29/24	\$12,000.00	\$6,500.00
12/06/24	\$12,000.00	\$6,500.00
12/13/24	\$12,000.00	\$6,500.00
12/20/24	\$12,000.00	\$6,500.00
12/27/24		\$6,500.00
01/03/25		\$6,500.00
01/10/25		\$6,500.00
01/17/25		\$14,500.00
01/24/25		\$6,500.00
01/27/25		\$8,000.00
02/03/25		\$14,500.00
02/07/25		\$14,500.00
02/18/25		\$14,500.00
03/03/25		\$12,500.00
03/18/25		\$12,500.00
04/11/25	\$10,000.00	
Subtotals	\$76,000.00	\$194,500.00
GRAND TOTAL PAID		\$270,500.00

4. I requested and received copies of all related wire transfer confirmations from VSI’s finance department and reviewed them to confirm the accuracy of the table above.

5. As detailed above, eight separate payments totaling \$76,000 were made by VSI to Christopher Michaels at Brown & Michaels PC IOLA Trust account at Tompkins Community Bank pursuant to the LFCA and its amendments. True and correct copies of these wire transfer payments are attached hereto as **Exhibit 5**.

6. As detailed above, eighteen separate payments totaling \$194,500 were made by VSI to the Tompkins Community Bank account of SVS 3D Consulting Services (“SVS 3D”) pursuant to the LFCA and its amendments. SVS 3D was the entity designated by Rembrandt in those agreements to receive payments on behalf of Stephen K. Blumenthal, CEO of Rembrandt. True and correct copies of the wire transfer payments to SVS 3D are attached hereto as **Exhibit 6.**

Executed under penalty of perjury this 8th day of August, 2025.

A handwritten signature in blue ink, appearing to read "C. Robertson", is written over a horizontal line.

Charles M. Robertson

EXHIBIT 5

Wire Transfer Payment Confirmations to

Chris Michaels, Rembrandt Counsel

Brown & Michaels, PC

[Print this Page](#)

Transfer status: In Process

Order number: 20241108B6B7HU4R009963

Transfer Accounts

From: Business Adv Fundamentals - 7952 : [REDACTED]

To: Chris (Tompkins County Trust Co)

Transfer Details

Send amount

Send amount: \$3,000.00

Additional fee: \$30.00

Transfer description

Legal Fees

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/08/2024

Estimated delivery date: 11/08/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241115B6B7HU3R021197****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$3,000.00

Additional fee: \$30.00

Transfer description

Legal Fees

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/15/2024

Estimated delivery date: 11/15/2024

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: In Process****Order number: 20241121B6B7HU3R015093****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount****Send amount:** \$12,000.00

Additional fee: \$30.00

Transfer description

Legal Fees

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/21/2024

Estimated delivery date: 11/21/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 523423958****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$12,000.00

Additional fee: \$30.00

Transfer description

Legal Fees 11-29-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/29/2024

Estimated delivery date: 11/29/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241206B6B7HU4R016104****Transfer Accounts****From:** Business Adv Fundamentals - [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$12,000.00

Additional fee: \$30.00

Transfer description

Legal Fees 12-6-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/06/2024

Estimated delivery date: 12/06/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241213B6B7HU3R013317****Transfer Accounts****From:** Business Adv Fundamentals - 7952 [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount****Send amount:** \$12,000.00

Additional fee: \$30.00

Transfer description

Legal Fees 12-13-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/13/2024

Estimated delivery date: 12/13/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 527143188****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** Chris (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$12,000.00

Additional fee: \$30.00

Transfer description

Legal Fees 12-20-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/20/2024

Estimated delivery date: 12/20/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)

Transfer status: In Process

Order number: 20250411B6B7HU1R013351

Transfer Accounts

From: Business Adv Fundamentals - 7952 ; [REDACTED]

To: Chris (Tompkins County Trust Co)

Transfer Details

Send amount

Send amount: \$10,000.00

Additional fee: \$30.00

Transfer description

Participation in next week

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 04/11/2025

Estimated delivery date: 04/11/2025

Note: The receiving bank may make funds available later than this.

EXHIBIT 6

Wire Transfer Payment Confirmations to

Stephen K. Blumenthal, CEO of Rembrandt

d/b/a SVS 3D Consulting Services

[Print this Page](#)**Transfer status: In Process****Order number: 20241108B6B7HU4R010602****Transfer Accounts****From:** Business Adv Fundamentals - 7952 [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$25,000.00

Additional fee: \$30.00

Transfer description

Legal Fees

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/08/2024

Estimated delivery date: 11/08/2024

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: In Process****Order number: 20241115B6B7HU1R021851****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount****Send amount:** \$20,000.00

Additional fee: \$30.00

Transfer description**Legal Fees****Transfer dates**

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/15/2024

Estimated delivery date: 11/15/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 522155254****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fees

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/21/2024

Estimated delivery date: 11/21/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 523424864****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fees 11-29-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 11/29/2024

Estimated delivery date: 11/29/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241206B6B7HU1R016626****Transfer Accounts****From:** Business Adv Fundamentals [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fees 12-6-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/06/2024

Estimated delivery date: 12/06/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241213B6B7HU1R013524****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fees 12-13-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/13/2024

Estimated delivery date: 12/13/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241220B6B7HU4R021673****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fees 12-20-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/20/2024

Estimated delivery date: 12/20/2024

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20241227B6B7HU4R010170****Transfer Accounts****From:** Business Adv Fundamentals - 7952 [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal fee 12-27-2024

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 12/27/2024

Estimated delivery date: 12/27/2024

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: In Process****Order number: 529393298****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal fee 1-3-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 01/03/2025

Estimated delivery date: 01/03/2025

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: In Process****Order number: 20250110B6B7HU1R014462****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$6,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal fee 1-10-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 01/10/2025

Estimated delivery date: 01/10/2025

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20250117B6B7HU3R018228****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$14,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal fee 1-17-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 01/17/2025

Estimated delivery date: 01/17/2025

Note: The receiving bank may make funds available later than this.



Business Adv Fundamentals - 7952: Account Activity Transaction Details

Post date: 01/24/2025

Amount: -6,500.00

Type: Withdrawal

Description: WIRE TYPE:WIRE OUT DATE:250124
TIME:1641 ET TRN:2025012400638565
SERVICE REF:018617 BNF:SVS 3D
CONSULTING SERVICES ID:0111142536 BNF
BK:TOMPKINS COMMUNITY BANK
ID:021302648 PMT DET:532582242
BLUMENTHAL LEGAL FEE 1-24-2025

Merchant name: SVS 3D CONSULTING SERVICES



**Merchant
information:**

**Transaction
category:** Cash, Checks & Misc: Other Expenses

Print this Page**Transfer status: Scheduled****Order number: 532626386****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$8,000.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fee 1-25-2025

Transfer dates

Frequency: One time on...

Delivery speed: Same Day

Start on date: 01/27/2025

Estimated delivery date: 01/27/2025

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: Scheduled****Order number: 533876758****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$14,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fee 2-2-2025

Transfer dates

Frequency: One time on...

Delivery speed: Same Day

Start on date: 02/03/2025

Estimated delivery date: 02/03/2025

Note: The receiving bank may make funds available later than this.

[Print this Page](#)**Transfer status: In Process****Order number: 20250207B6B7HU4R011226****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$14,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fee 2-7-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 02/07/2025

Estimated delivery date: 02/07/2025

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: In Process****Order number: 20250218B6B7HU4R020302****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$14,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal fee 2-18-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 02/18/2025

Estimated delivery date: 02/18/2025

Note: The receiving bank may make funds available later than this.

Print this Page**Transfer status: Scheduled****Order number: 538596672****Transfer Accounts****From:** Business Adv Fundamentals - 7952 : [REDACTED]**To:** SVS (Tompkins County Trust Co)**Transfer Details****Send amount**

Send amount: \$12,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fee 3-1-2025

Transfer dates

Frequency: One time on...

Delivery speed: Same Day

Start on date: 03/03/2025

Estimated delivery date: 03/03/2025

Note: The receiving bank may make funds available later than this.

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Transfer status: In Process

Order number: 20250318B6B7HU3R012108

Transfer Accounts

From: Business Adv Fundamentals - 7952 : [REDACTED]

To: SVS (Tompkins County Trust Co)

Transfer Details

Send amount

Send amount: \$12,500.00

Additional fee: \$30.00

Transfer description

Blumenthal Legal Fee 3-18-2025

Transfer dates

Frequency: One time, immediately

Delivery speed: Same Day

Start on date: 03/18/2025

Estimated delivery date: 03/18/2025

Note: The receiving bank may make funds available later than this.